

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,

**Plaintiff,
v.**

**SOUTHERN BAPTIST CONVENTION;
GUIDEPOST SOLUTIONS LLC; and
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION**

Defendants.

Case No. 3:23-cv-00243

**Judge Campbell
Magistrate Judge Frensley**

JURY DEMAND

**UNOPPOSED JOINT MOTION TO EXTEND COURT'S APRIL 19, 2024 DEADLINE
FROM ITS ORDER (ECF DOC. NO. 187)**

By order dated April 11, 2024, this Court addressed issues raised in Jane Doe's Motions to Proceed Pseudonymously, for Leave to File Under Seal, and for Protective Order, Doc. Nos. 168, 170, 174, which relate to her deposition in this matter as a non-party witness.¹ See Doc. No. 187, Order dated April 11, 2024. This Court ordered that Jane Doe's deposition go forward on a date agreeable to all parties but no later than May 31, 2024, *id.* at 3, and in the interim, that Ms. Doe be referred to only by her pseudonym and that her name and identifying information be redacted from all public filings. The Court also directed counsel for the Plaintiff and Jane Doe to meet and confer to resolve the remaining issues raised in Jane Doe's Motions related to her pending deposition. *Id.* at 3, 4.

Plaintiff and Jane Doe have made substantial progress in resolving the issues in Jane Doe's Motions. However, because of depositions previously scheduled and held in the case between the

¹ The Court also denied Jane Doe's Motion to Expedite and for Emergency Relief (Doc. No. 172) and Plaintiff's motion to strike (Doc. No. 181). Doc. No. 187, at 4-5.

Court's order on April 11, 2024 and the deadline of April 19, 2024 for the in-person meet and confer and report to the Court, Plaintiff and Jane Doe respectfully request leave of the Court for additional time to reach resolution, extending the deadline from April 19, 2024 by ten days, to April 29, 2024.

Additionally, Plaintiff and Jane Doe agree to the following briefing schedule regarding Jane Doe's pending motions. Plaintiff will respond to Jane Doe's pending motions no later than May 2, 2024 (if necessary), and reply briefs by Jane Doe (if necessary) will be due no later than May 4, 2024.

Counsel for Defendants do not oppose the extension of the April 19, 2024 deadline to April 29, 2024 or the extension of the briefing schedule as proposed.

Therefore, Plaintiff and Jane Doe, by and through counsel, respectfully request a ten-day extension through April 29, 2024, within which to comply with the Court's April 11, 2024 order (ECF Doc. No. 187) regarding their meet and confer and report to the Court of resolved and/or open issues from Jane Doe's Motions (ECF Doc. Nos. 168, 170, and 174), as well as an extension to the current briefing schedule regarding Jane Doe's pending motions.

Dated: April 19, 2024

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CERTIFICATE OF SERVICE

The undersigned certifies that on **April 19, 2024**, I electronically filed a copy of the foregoing with the Clerk of Court for the U.S. District Court Middle District of Tennessee through the Court's Electronic Case Filing System, which will automatically serve all counsel of record listed below.

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